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AZ CORO COMMISSION BODNET CONTROL

Counsel for Interested Parties Greenberg Traurig, LLP and Robert S. Kant

2425 East Camelback Road, Suite 1020

BEFORE THE ARIZONA CORPORATION COMMISSION

In the matter of:

Martin R. Galbut (#002943)

Michaile J. Berg (#027166)

Phoenix, Arizona 85016 Phone: 602.955.1455

docket@galbutlaw.com

GALBUT & GALBUT, P.C.

602.955.1585

Bryan J. Gottfredson (#025140)

RADICAL BUNNY, L.L.C., an Arizona limited liability company;

HORIZON PARTNERS, L.L.C., an Arizona limited liability company;

TOM HIRSCH (aka TOMAS N. HIRSCH) and DIANE ROSE HIRSCH, husband and wife;

BERTA FRIEDMAN WALDER (aka BUNNY WALDER), a married person;

HOWARD EVAN WALDER, a married person;

HARISH PANNALAL SHAH and MADHAVI H. SHAH, husband and wife.

Respondents.

DOCKET NO. S-20660A-09-0107

MOTION TO ASSOCIATE COUNSEL PRO HAC VICE

(Assigned to the Hon. Lyn Farmer)

Arizona Corporation Commission

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Martin R. Galbut and Michaile J. Berg of Galbut & Galbut, P.C., pursuant to Rule 38(a), Ariz. R. Sup. Ct., move the Commission to associate Kevin M. Downey of Williams & Connolly, L.L.P. as counsel *pro hac vice* in this action. In support of this motion and pursuant to Rule 38(a)(3)(C), the following original documents are attached.

- 1. Verified Application to Appear *Pro Hac Vice*;
- 2. Certificate(s) of Good Standing; and

State Bar of Arizona Notice of Receipt of Complete Application. 3. 1 Martin R. Galbut and Michaile J. Berg of Galbut & Galbut, P.C. hereby agree to 2 serve as local counsel in this matter and accept the responsibilities detailed in Rule 3 39(a)(2), Ariz. R. Sup. Ct. 4 RESPECTFULLY SUBMITTED this 29th day of October, 2010. 5 GALBUT & GALBUT, P.C. 6 7 8 Martin R. Galbut, Esq. Michaile J. Berg, Esq. 9 Attorneys for Interested Parties Greenberg 10 Traurig, LLP and Robert S. Kant 11 ORIGINAL and 13 copies filed this 29th day of October, 2010, with: 12 13 Arizona Corporations Commission Docket Control 1200 W. Washington Street 14 Phoenix, Arizona 85007-2996 15 CQPY hand-delivered this 16 29th day of October, 2010, to: 17 Honorable Lyn Farmer Arizona Corporations Commission 18 1200 W. Washington Street Phoenix, Arizona 85007-2996 19 COPIES hand-delivered this 29th day of October, 2010, to: 20 21 Julie Coleman, Esq. Arizona Corporations Commission Securities Division 1300 W. Washington, 3rd Floor 22 23 Phoenix, Arizona 85007 Attorneys for the ACC, Securities Division 24 25

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and Diane Rose Hirsch, Berta Friedman
Walder, Howard Evan Walder, Harish
Pannalal Shah and Madhavi H. Shah

Matthew K. LaVelle, Esq.
Lavelle, Esq